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6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 KAMLESH BANGA,

10 Plaintiff,

11 vs.

12 EQUIFAX INFORMATION
SERVICES LLC,

13 Defendant.

) Civil Action No.

) **DEFENDANT EQUIFAX**
) **INFORMATION SERVICES LLC'S**
) **NOTICE OF REMOVAL**

14
15 Defendant, Equifax Information Services LLC ("Equifax"), by Counsel,
16 hereby files this Notice of Removal from the Superior Court of California,
17 County of San Francisco, where it is now pending as Case No. CGC-13-536520,
18 to the United States District Court for the Northern District of California. This
19 Notice of Removal is filed pursuant to 28 U.S.C. § 1441(b) and § 1446. In
20 support of the removal, Defendant shows the Court as follows:

1 1. An action was filed on June 16, 2014 in the Superior Court of
2 California, County of San Francisco, entitled *Banga v. Equifax Information*
3 *Services LLC*, Case No. CGC-13-536520 (the “State Court Action”).

4 2. Equifax was served with the Complaint on June 18, 2014.

5 3. This Notice is being filed with this Court within thirty (30) days after
6 Equifax was served with a copy of Plaintiff’s initial pleading setting forth the
7 grounds for her action and her claims for relief.

8 4. This Court has original jurisdiction over this case pursuant to 28
9 U.S.C. § 1332(a), in that the parties to this action are citizens of different states
10 and the amount in controversy exceeds \$75,000.

11 5. Plaintiff’s Complaint, on its face, states that Plaintiff is a resident of
12 Solano County, California. (Compl. ¶ 3.)

13 6. Plaintiff’s Complaint further states that Equifax is a foreign
14 corporation with corporate headquarters in Atlanta, Georgia. (*Id.* ¶ 4.)

15 7. Equifax is, in fact, a Georgia Limited Liability Company with its
16 headquarters and principal place of business in Atlanta, Georgia.

17 8. Plaintiff seeks “Actual and/or Statutory damages against Equifax in
18 the sum of \$250,000.” (*Id.* at 9.) She also seeks punitive damages against
19 Equifax. (*Id.*)
20

10. Attached, as Exhibit A, are copies of the Summons and Complaint served upon Equifax in the State Court Action, and as Exhibit B, copies of all documents filed to date in State Court.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Dated: July 2, 2014

NOKE & QUINN

/s/ Thomas P. Quinn, Jr.
THOMAS P. QUINN, JR.
Attorney for Defendant Equifax
Information Services LLC

CERTIFICATE OF SERVICE

KAMLESH BANGA v. EQUIFAX INFORMATION SERVICES LLC

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Orange, State of California, and not a party to the above-entitled cause.

On July 2, 2014, I served a true copy of DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S NOTICE OF REMOVAL

☐ By personally delivering it to the persons(s) indicated below in the manner as provided in Federal Rule of Civil Procedure 5(B)

☒ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid and addressed to the following:

Kamlesh Banga
P.O. Box 5656
Vallejo, CA 94591

☐ By ECF: On this date, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/S/ Thomas P. Quinn, Jr.

Place of Mailing: Laguna Beach, California

Executed on July 2, 2014, at Laguna Beach, California.